

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CIMC RAFFLES OFFSHORE (SINGAPORE) PTE
LTD. and YANTAI CIMC RAFFLES OFFSHORE
LIMITED,

Petitioners,

v.

SORATU DRILLING LLC AND BAERFIELD
DRILLING LLC,

Respondents.

14 Civ. 2279 (JSR)

**ECF CASE
Electronically Filed**

**NOTICE OF RESPONDENTS' MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION AND FORUM NON CONVENIENS, OR
ALTERNATIVELY, TO TRANSFER VENUE**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and the declaration of Fernando Schahin, Respondents Baerfield Drilling LLC and Soratu Drilling LLC (collectively, "Respondents") respectfully move this Court, before the Honorable Jed S. Rakoff, at the United States Courthouse, 500 Pearl Street, Room 14B, New York, New York, on June 10, 2014, for an order pursuant to Federal Rule of Civil Procedure 12(b)(2), 28 U.S.C. §§ 1404(a) and 1406(a), and the doctrine of *forum non conveniens*, for an order dismissing this action for lack of personal jurisdiction, on grounds of *forum non conveniens*, or alternatively,

transferring venue, together with such other and further relief as the Court may deem just and proper.

Dated: New York, New York
May 15, 2014

Respectfully submitted,

Linklaters LLP

By: /s/ Paul S. Hessler

Paul S. Hessler

Patrick C. Ashby

Efrat F. Fish

1345 Avenue of the Americas

New York, NY 10105

(212) 903-9000

(212) 903-9100 (fax)

*Attorneys for Baerfield Drilling LLC and
Soratu Drilling LLC*